

Message

From: Mustafa, Sufi A., NMENV [sufi.mustafa@state.nm.us]
Sent: 2/16/2021 8:04:10 PM
To: Casso, Ruben [Casso.Ruben@epa.gov]
Subject: RE: DRAFT NESHAP Commercial Sterilizers regulation development QA/QC review
Attachments: 2019_01_03-Sterigenics Santa Teresa 11-27-18 Oxidizer Report.pdf; 2020_11_25-Sterigenics Santa Teresa 11-5-20 Oxidizer Report.pdf

Ruben

We support your efforts. Please find in attachment two reports I obtained from our bureau's Compliance and Enforcement Section. We have reports for few more years readily available.

We are in the middle of our campaign to collect actual emission inventory from minor sources for the year 2020. We will have emissions from this facility for year 2020 by April 1st this year. We can expedite the review of their submittal to provide you the data. Please let me know if this will help your task.

Thank you.

Sufi Mustafa

From: Casso, Ruben <Casso.Ruben@epa.gov>
Sent: Tuesday, February 16, 2021 12:38 PM
To: Mustafa, Sufi A., NMENV <sufi.mustafa@state.nm.us>
Cc: Verhalen, Frances <verhalen.frances@epa.gov>
Subject: [EXT] RE: DRAFT NESHAP Commercial Sterilizers regulation development QA/QC review

Thank you so much for the information. We appreciate any assistance NMED provides on this effort. -Ruben

From: Mustafa, Sufi A., NMENV <sufi.mustafa@state.nm.us>
Sent: Friday, February 12, 2021 11:48 AM
To: Casso, Ruben <Casso.Ruben@epa.gov>; Higgin, Roslyn, NMENV <Roslyn.Higgin@state.nm.us>
Subject: RE: DRAFT NESHAP Commercial Sterilizers regulation development QA/QC review

Ruben

I am sorry for a delayed response.

We checked to see what has been done in modeling and emission inventory. We did not find any modeling analyses for the toxics listed in the spreadsheet. Since this is not a title v facility or a facility that emit >100 tpy of a criteria pollutant we had not collected emission inventory from them.

I am attaching some documents we found in our database related to their permit. I also attached my modeling analyses review report from 2006.

I will search for the stack test data report you requested. I will let you know soon.

Note:

Because Propylene Oxide is a HAP but is not a NM TAP (is not listed in Table A of NMAC 20.2.72.501) there are no modeling files that include it. Below is quick comparison of the allowable emissions from the current permit, and those in the EPA spreadsheet –

Stack	Description	Permitted "EO or PO" 0733M15R1 (Issued 12/23/2014) (TPY)	Allowable Propylene Oxide Emissions from EPA spreadsheet (TPY)

AR	Aeration rooms		47.9
SRA	Sterilizer room area, Fugitive Emissions		3.38
SC	Sterilization chambers, Chamber Exhaust		8.46
SC	Sterilization chambers, Sterilization		773
SW	Shipping or warehouse, Fugitive Emissions		5.08
CD-1 or CD-2	Ceilcote Acid-Water Scrubber System, controls sterilizer vacuum pumps for chambers	5.7	
CD-3	Donaldson 20,000 AG EtO Abator, controls aeration rooms 8-9 and back vent exhausts	0.4	
Total		6.1	837.5

Please let me know if you need any other information.
Thank you.

Sufi A. Mustafa, Ph.D.

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"Innovation, Science, Collaboration, Compliance"

From: Casso, Ruben <Casso.Ruben@epa.gov>

Sent: Thursday, February 11, 2021 2:08 PM

To: Mustafa, Sufi A., NMENV <sufi.mustafa@state.nm.us>; Higgin, Roslyn, NMENV <Roslyn.Higgin@state.nm.us>

Subject: [EXT] RE: DRAFT NESHAP Commercial Sterilizers regulation development QA/QC review

Is NMED is going to be able to provide EPA any additional information on this facility? If possible, our HQ office is also hoping to get a copy of the wet scrubber (CD-2) stack test from this facility. -Ruben

From: Casso, Ruben

Sent: Tuesday, February 9, 2021 12:01 PM

To: sufi.mustafa@state.nm.us; Roslyn.Higgin@state.nm.us

Cc: Verhalen, Frances <verhalen.frances@epa.gov>

Subject: RE: DRAFT NESHAP Commercial Sterilizers regulation development QA/QC review

I was checking back to see if NMED is going to be able to provide EPA any additional information on this facility. Please let me know. Thank you.

From: Casso, Ruben

Sent: Tuesday, January 19, 2021 8:09 AM

To: sufi.mustafa@state.nm.us; Roslyn.Higgin@state.nm.us

Cc: Verhalen, Frances <verhalen.frances@epa.gov>

Subject: DRAFT NESHAP Commercial Sterilizers regulation development QA/QC review

EPA is in the process of reviewing the commercial sterilizer air toxics regulation, NESHAP Subpart O, for potential revisions. To ensure help ensure the quality of EPA air dispersion modeling, EPA is requesting NMED review the accuracy of the information in attached files and to provide any corrections or updates to the relevant emissions data for this source.

SOURCE: Sterigenics, Santa Teresa, NM

EPA would like to receive a response to this request no later than 2/8/21. EPA appreciates NMED's assistance in this matter. If you have any questions, please contact me.

Thank you.

Ruben Casso
Air Toxics Coordinator
EPA Region 6